

Attachments

(800) Operating Companies
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHIAKUM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	360 465-2211
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@wwest.net
<810>	Reporting Carrier	Western Wahkiakum County Telephone Company
<811>	Holding Company	Wahkiakum West, Inc.
<812>	Operating Company	Western Wahkiakum County Telephone Company

[illegible]

FCC Form 481 (October 2013), Line 510
Description of Processes and Procedures to Ensure
Compliance with Service Quality Standards and
Consumer Protection Rules Per Instructions
for Completing FCC Form 481 Instructions

This document details the processes and procedures that Western Wahkiakum County Telephone Company (the "Company") follows to ensure compliance with service quality standards and consumer protections rules as set forth in the Instructions for Completing FCC Form 481.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time that the plant and facilities are constructed. Plant is augmented, upgraded and/or reconfigured as needed.

In addition, Company employees are periodically briefed on issues involving service quality standards and consumer protection rules. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues. A recent example is the call completion problems that have arisen and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefore, deserves the attention of Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If a complaint pertaining to the Company's compliance with service quality standards or consumer protection rules is received by the Company, the complaint is promptly investigated, the matter tracked and any corrective action noted. This process ensures that issues involved in the matter are addressed and corrections made, if needed. It should be noted that the Company has received no customer complaints in the past five years regarding service quality standards or consumer protection rules as they relate to the service offered by the Company other than call completion issues, which, as noted above, are not caused by the Company.

FCC Form 481 (October 2013), Line 610
Statement Describing Ability to Function
in Emergency Situations Per Instructions
for Completing FCC Form 481

At line 600 of FCC Form 481, Western Wahkiakum County Telephone Company the "Company") certified that it is able to function in emergency situations as set forth in 47 C.F.R § 54.202(a)(2). This means that the Company has a reasonable amount of back-up power to ensure functionality without an external source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. This statement describes how the Company is prepared to provide continued service in an emergency situation.

The Company's network providing voice telephony service includes two (2) central offices and twenty-two (22) digital loop carrier sites ("DLCs"). The two central offices are equipped with back-up batteries having a capacity to provide reserve power in the event of a power outage for up to approximately eight (8) days, while the DLCs are equipped with batteries having a capacity to provide reserve power in the event of a power outage for up to approximately two (2) days. The Company also maintains fixed back-up power generators at its two central office locations and at the locations of three of its more significant DLCs. There are automatic power transfer switches at each of those five locations, so in the event of a commercial power failure, the transfer to back-up power should occur seamlessly. The Company also maintains three (3) portable generators to be transported to the remaining locations, if needed. All locations are subject to status alarm monitoring that is connected to the Company's principal central office.

The Company has three (3) fiber cable rings that provide redundancy and diversity connecting the Company's principal switching facilities with one another and connecting a number of the remote DLC locations with their serving switching facility.

Each of the Company's fiber-connected sites has built in redundancy for fiber transceivers. Most of the Company's switching and other electronic/optronic equipment has some redundancy built in, and the Company keeps critical-spare replacement components on hand. The Company also subscribes to support service from the principal vendors of its switching and transmission equipment.

The Company has system redundancy for interexchange access service circuits (including as utilized by its affiliate to provide long distance service), E-911 trunking and SS7 signaling circuits.

Most of the Company's outside plant cable and wire is buried and thus protected from most weather events. The Company's central office switch capacity is engineered to accommodate traffic spikes, and its interexchange facilities also have the capacity to provide additional circuits for interexchange carriers should the need arise. The existing

120 interexchange trunks serving interexchange carriers provide a substantial margin of safety for traffic spikes and may be utilized for the traffic of all interexchange carriers to whom the Company provides switched access service.

In the case of isolated groups of customers that may suffer damage due to a cable cut, the Company maintains sufficient staff and other resources to be able to put customers back in service in a very short amount of time, subject to road accessibility and environmental limitations. The Company's emergency service equipment is located within its service area and requires very little time to dispatch.

FCC Form 481 (October 2013), Line 1210
Terms and Conditions of Voice Telephony Service Plan
Offered to Lifeline Subscribers
Per Instructions for Completing FCC Form 481

Discounted Telephone Service Available

Wahkiakum West Telephone provides Lifeline and Washington Telephone Assistance Program (WTAP) Benefits to qualified subscribers in Grays River, Naselle and Rosburg.

You may qualify for WTAP and/or Lifeline Service if you meet certain low-income eligibility requirements. WTAP benefits include a discount of \$3.25 per month on basic residential telephone service. Lifeline benefits include a discount of \$9.25 per month.

Customers of Wahkiakum West receiving both Lifeline and WTAP credits pay only \$8.00 per month for basic local telephone service not including taxes and surcharges.

WTAP benefits also include discounting one half of the connection fee up to \$22 when activating or moving service.

Line 1222 Details on the number of minutes provided as part of the plan.

The Company provides flat rate local exchange service to its Lifeline subscribers. It does not offer measured local exchange service or measured Extended Area Service ("EAS"), so the number of local exchange service and EAS minutes that are provided as part of the Lifeline plan is essentially unlimited. EAS exists between the Company's Grays River and Naselle exchanges.

Line 1223 Additional charges for toll calls, and rates for such plan.

The Company does not provide toll services to its Lifeline subscribers, but does provide access to toll service providers. Company Lifeline subscribers have to choose their own toll service providers. Accordingly, subscribers to the Company's Lifeline service do not incur any Company toll charges. No Company charges, other than those for the local exchange service and EAS that is included in the Company's Lifeline plan are required in order for a qualifying low-income consumer to receive Lifeline service from the Company.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		<i>This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.</i> BORROWER NAME Western Wahkiakum County Telephone Company (Prepared with Audited Data)			
INSTRUCTIONS: Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.		PERIOD ENDING December, 2012	BORROWER DESIGNATION WA0535		
CERTIFICATION We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief. ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES. DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII (Check one of the following)					
<input type="checkbox"/> All of the obligations under the RUS loan documents have been fulfilled in all material respects.		<input type="checkbox"/> There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report			
_____ DATE _____					
PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents	501,577	1,534,932	25. Accounts Payable	595,246	40,073
2. Cash-RUS Construction Fund	268	288	26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments	18,527	17,936
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt	161,200	216,200
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable	399,577	352,698	32. Income Taxes Accrued		21,700
b. Other Accounts Receivable			33. Other Taxes Accrued	51,768	57,715
c. Notes Receivable			34. Other Current Liabilities	53,764	24,519
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)	880,505	378,143
6. Material-Regulated	93,910	78,061	LONG-TERM DEBT		
7. Material-Nonregulated	834	851	36. Funded Debt-RUS Notes	334,770	309,892
8. Prepayments	11,567	9,487	37. Funded Debt-RTB Notes	563,057	415,881
9. Other Current Assets	228,865		38. Funded Debt-FFB Notes		1,753,523
10. Total Current Assets (1 Thru 9)	1,236,598	1,976,317	39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Reacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies	384,745	31,006
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)	1,282,572	2,510,302
13. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets	11,367	10,278	47. Other Long-Term Liabilities		
15. Deferred Charges			48. Other Deferred Credits	909,727	882,797
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)	11,367	10,278	50. Total Other Liabilities and Deferred Credits (47 thru 49)	909,727	882,797
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service	16,456,230	17,409,211	51. Cap. Stock Outstand. & Subscribed	54,171	54,171
19. Property Held for Future Use			52. Additional Paid-in-Capital	279,251	279,251
20. Plant Under Construction	627,177	558,082	53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation	11,302,856	12,242,855	55. Other Capital		
23. Net Plant (18 thru 21 less 22)	5,780,551	5,724,438	56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins	3,622,290	3,606,369
			58. Total Equity (51 thru 57)	3,955,712	3,939,791
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)	7,028,516	7,711,033
	7,028,516	7,711,033			

Total Equity = 51.09% % of Total Assets

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		WA0535	
		PERIOD ENDING	
INSTRUCTIONS- See RUS Bulletin 1744-2		December, 2012	
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS			
ITEM		PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		228,561	222,043
2. Network Access Services Revenues		3,040,791	3,085,807
3. Long Distance Network Services Revenues			
4. Carrier Billing and Collection Revenues		25,277	23,182
5. Miscellaneous Revenues		7,926	5
6. Uncollectible Revenues		366	279
7. Net Operating Revenues (1 thru 5 less 6)		3,302,189	3,330,758
8. Plant Specific Operations Expense		463,220	489,579
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		519,472	583,873
10. Depreciation Expense		1,019,933	988,354
11. Amortization Expense			
12. Customer Operations Expense		190,989	136,737
13. Corporate Operations Expense		887,136	993,023
14. Total Operating Expenses (8 thru 13)		3,080,750	3,191,566
15. Operating Income or Margins (7 less 14)		221,439	139,192
16. Other Operating Income and Expenses			
17. State and Local Taxes		59,671	75,783
18. Federal Income Taxes		46,116	4,743
19. Other Taxes			
20. Total Operating Taxes (17+18+19)		105,787	80,526
21. Net Operating Income or Margins (15+16-20)		115,652	58,666
22. Interest on Funded Debt		68,419	64,157
23. Interest Expense - Capital Leases			
24. Other Interest Expense		1,089	1,089
25. Allowance for Funds Used During Construction		38,612	6,931
26. Total Fixed Charges (22+23+24-25)		30,896	58,315
27. Nonoperating Net Income		10,775	9,025
28. Extraordinary Items			
29. Jurisdictional Differences			
30. Nonregulated Net Income		(29,448)	(25,297)
31. Total Net Income or Margins (21+27+28+29+30-26)		66,083	(15,921)
32. Total Taxes Based on Income			
33. Retained Earnings or Margins Beginning-of-Year		3,556,207	3,622,290
34. Miscellaneous Credits Year-to-Date			
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date			
38. Transfers to Patronage Capital			
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]		3,622,290	3,606,369
40. Patronage Capital Beginning-of-Year			
41. Transfers to Patronage Capital			
42. Patronage Capital Credits Retired			
43. Patronage Capital End-of-Year (40+41-42)		0	0
44. Annual Debt Service Payments		220,197	225,711
45. Cash Ratio [(14+20-10-11) / 7]		0.6561	0.6857
46. Operating Accrual Ratio [(14+20+26) / 7]		0.9743	0.9999
47. TIER [(31+26) / 26]		3.1389	0.7270
48. DSCR [(31+26+10+11) / 44]		5.0723	4.5667

USDA-RUS

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0535

PERIOD ENDED

December, 2012

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1	R-1	BUSINESS	RESIDENTIAL	TOTAL	TOTAL (including fiber)	FIBER
	(a)	(b)	(a)	(b)	(c)	(a)	(b)
Grays River 465	16.80	13.40	47	319	366	166.83	63.51
Naselle 464	16.80	13.40	133	497	630	167.84	94.20
MobileWireless					0		
Route Mileage Outside Exchange Area						2.00	2.00
Total			180	816	996	336.67	159.71
No. Exchanges	2						

USDA-RUS

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0535

PERIOD ENDED

December, 2012

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

4. BROADBAND SERVICE

Details on Least Expensive Broadband Service

EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
Grays River 465	366	241	60	1,500	768	29.95	Package	DSL
Naselle 464	630	425	107	1,500	768	29.95	Package	DSL
Total	996	666						

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS			BORROWER DESIGNATION WA0535 PERIOD ENDING December, 2012		
INSTRUCTIONS- See RUS Bulletin 1744-2					
PART D. SYSTEM DATA					
1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile	
7	9	110	9.05	2.96	
PART E. TOLL DATA					
1. Study Area ID Code(s) a. 522451 b. _____ c. _____ d. _____ e. _____ f. _____ g. _____ h. _____ i. _____ j. _____		2. Types of Toll Settlements (Check one) <div style="display: flex; justify-content: space-between;"> <div> Interstate: <input type="checkbox"/> Average Schedule Intrastate: <input type="checkbox"/> Average Schedule </div> <div> <input checked="" type="checkbox"/> Cost Basis <input checked="" type="checkbox"/> Cost Basis </div> </div>			
PART F. FUNDS INVESTED IN PLANT DURING YEAR					
1. RUS, RTB, & FFB Loan Funds Expended					1,798,023
2. Other Long-Term Loan Funds Expended					
3. Funds Expended Under RUS Interim Approval					
4. Other Short-Term Loan Funds Expended					
5. General Funds Expended (Other than Interim)					(313,658)
6. Salvaged Materials					270
7. Contribution in Aid to Construction					(225)
8. Gross Additions to Telecom. Plant (1 thru 7)					1,484,410
PART G. INVESTMENTS IN AFFILIATED COMPANIES					
INVESTMENTS	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year	Income/Loss This Year	Cumulative Investment To Date	Cumulative Income/Loss To Date	Current Balance
	(b)	(c)	(d)	(e)	(f)
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development					

USDA-RUS
**OPERATING REPORT FOR
 TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

WA0535

PERIOD ENDING

December, 2012

PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)



YES



NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	16.00%
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	16.00%
5. Land and support assets - Buildings	4.00%
6. Land and support assets - Furniture and Office equipment	20.00%
7. Land and support assets - General purpose computers	20.00%
8. Central Office Switching - Digital	9.00%
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	13.00%
12. Central Office Transmission - Circuit equipment	11.19%
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	7.59%
19. Cable and wire facilities - Aerial cable - Metal	20.40%
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	6.00%
22. Cable and wire facilities - Underground cable - Fiber	5.00%
23. Cable and wire facilities - Buried cable - Metal	6.00%
24. Cable and wire facilities - Buried cable - Fiber	5.00%
25. Cable and wire facilities - Conduit systems	4.55%
26. Cable and wire facilities - Other	

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		WA0535	
		PERIOD ENDED December, 2012	
INSTRUCTIONS – See help in the online application.			
PART I – STATEMENT OF CASH FLOWS			
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)		501,845	
CASH FLOWS FROM OPERATING ACTIVITIES			
2. Net Income		(15,921)	
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities			
3. Add: Depreciation		988,354	
4. Add: Amortization		0	
5. Other (Explain) Other items allocated to financing and investing sections		326,430	
Changes in Operating Assets and Liabilities			
6. Decrease/(Increase) in Accounts Receivable		46,879	
7. Decrease/(Increase) in Materials and Inventory		15,832	
8. Decrease/(Increase) in Prepayments and Deferred Charges		2,080	
9. Decrease/(Increase) in Other Current Assets		228,865	
10. Increase/(Decrease) in Accounts Payable		(555,173)	
11. Increase/(Decrease) in Advance Billings & Payments		(591)	
12. Increase/(Decrease) in Other Current Liabilities		(29,245)	
13. Net Cash Provided/(Used) by Operations		1,007,510	
CASH FLOWS FROM FINANCING ACTIVITIES			
14. Decrease/(Increase) in Notes Receivable		0	
15. Increase/(Decrease) in Notes Payable		0	
16. Increase/(Decrease) in Customer Deposits		0	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)		1,282,730	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits		(26,930)	
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital		0	
20. Less: Payment of Dividends		0	
21. Less: Patronage Capital Credits Retired		0	
22. Other (Explain) Other items not included above		254,205	
23. Net Cash Provided/(Used) by Financing Activities		1,510,005	
CASH FLOWS FROM INVESTING ACTIVITIES			
24. Net Capital Expenditures (Property, Plant & Equipment)		(883,886)	
25. Other Long-Term Investments		0	
26. Other Noncurrent Assets & Jurisdictional Differences		1,089	
27. Other (Explain) Plant adjustments not on line 24		(601,343)	
28. Net Cash Provided/(Used) by Investing Activities		(1,484,140)	
29. Net Increase/(Decrease) in Cash		1,033,375	
30. Ending Cash		1,535,220	

Revision Date 2010

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0535
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2012
NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0535
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2012
CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

Operating Report Checks

Borrower Name: Western Wahkiakum County Telephone Company

Year: 2012

Borrower ID: WA0535

Period: December

Mortgage Ratio Checks

Type	Check Key	Description
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Warning	5000	Part B. Line 47, TIER [.7270], is below the minimum threshold identified by RUS staff [1.0000]. Please provide an explanation.
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Borrower Explanation: Pursuant to the FFB Loan Agreement dated June 10, 2011, Section 5.12, TIER Requirement, the Company "will endeavor, but is not required, to maintain a TIER of at least 1.0." The Company incurred additional expenses in 2012 relating to implementation and understanding of the FCC Order on USF and ICC reform.

Part B: Statements of Income and Retained Earnings or Margins

Type	Check Key	Description
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Warning	1010	"Line 31. Total Net Income or Margins This Year" [(15,921)] is generally greater than 0 (zero). Explain the reasons for the net loss.
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Borrower Explanation: The Company incurred additional expenses in 2012 relating to the implementation and understanding of the FCC order on USF and ICC reform.